

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

**JOHN BAXLEY, JR., et al,
on their own behalf and on behalf
of all others similarly situated,**

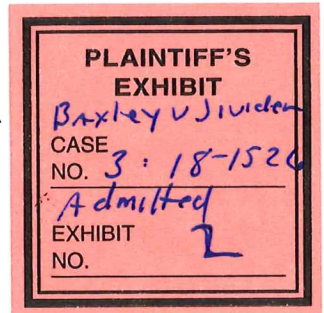
Plaintiffs,

v.

**Civ. Act. No. 3:18cv01526
(Hon. Robert Charles Chambers)**

**BETSY JIVIDEN, in her official capacity as
Commissioner of the WEST VIRGINIA
DIVISION OF CORRECTIONS AND
REHABILITATION,**

Defendant.



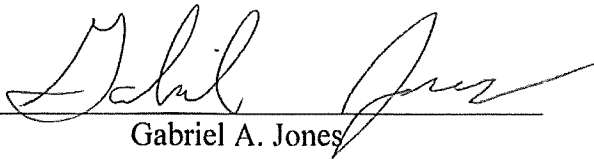
DECLARATION OF GABRIEL JONES

I, Gabriel Jones, declare the following:

1. I am employed by Mountain State Justice, Inc. as a paralegal. Specifically, I work with Lydia C. Milnes and Jennifer S. Wagner, who are Class Counsel on the case of *Baxley, et al v. Jividen*, No. 3:18cv01526.
2. On November 3, 2021, I accompanied Class Counsel for a scheduled hearing on a Motion for Preliminary Injunction.
3. Prior to the hearing was scheduled to begin, the Parties entered into negotiations to resolve the pending Motion for Preliminary Injunction.
4. During these negotiations, I contemporaneously compiled the attached notes documenting the agreements reached in the meeting. (Ex. A.)

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 7th day of December, 2021.



Gabriel A. Jones

✓
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T2-
EX-A

Intake and Outtake testing

3-7 day test in quarantine after immediate test

- testing close contact
- Broad-based testing

Quarantining

- Stay in cell unless its clear

Isolation

- Isolate positives away from negatives/untested
- Isolate positives, suspected
- CO's in full PPE in isolation

Masks

- Inmates should get 2 masks and replaced when needed
- Inmates should have access to cleaning supplies daily
- Antibody treatments

Vaccines

- Better efforts to educate

Data for testing

- symptomatic, quarantining, intake, outtake, transfer
- broad-base, close-contact